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JAMES H. QUELLO  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

February 18, 1994

The Honorable James H. Quello  
Acting Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Subject: Ex Parte Presentation in CC Docket No. 92-105

Dear Chairman Quello:

On behalf of the State of Montana, I respectfully request that the Commission adopt policies and rules requiring assignment of an N11 service code to state governments. Granting this request will further the public interest by ensuring that citizens may obtain uniform and easy telecommunications access to their state agencies and institutions. Such eased access is an essential element to restoring the trust of many citizens in their government operations.

This task is substantial by any measure. The Information Services Division of the State of Montana procures and administers the communications facilities and systems used by the vast array of state entities, including universities, law enforcement agencies, prisons and a multitude of other state agencies. Convenient access to all state institutions and programs is a key aspect of this effort.

Requiring the assignment of an N11 service code to state governments will greatly enhance such convenience. Such a three-digit code would be a simple, easily-remembered, easily-used gateway mechanism for contacting individual state institutions. And assigning the same code (e.g. 211) to each state government would create a standardized, nationwide, dial-up access to public resources much like the 911 emergency number that now pervades most of our society.

Last year, the Commission initiated a proceeding to adopt rules governing the assignment of N11 codes (CC Docket No. 92-105). The Commission also sought comment on a tentative proposal to make such codes available to private entities for their individual use in providing local pay-per-call services. We believe the record in Docket No. 92-105 demonstrates unequivocally that this proposal should not be adopted.

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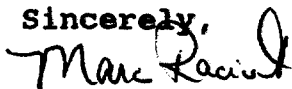
The vast majority of commenters agree that N11 codes are an extremely scarce public resource, that permitting commercial use of such codes will thereby secure an unreasonable and undue competitive advantage in the information services marketplace, and that a more than ample supply of alternative dialing arrangements is already available for commercial purposes. Under these circumstances, adoption of the Commission's tentative proposal is an unnecessary act that will further no public policy goals.

N11 service codes are part of a world-wide telecommunications numbering plan that is, in every sense, a public resource. The State of Montana strongly believes that in view of the scarcity of this resource, every effort should be made to ensure that it is utilized in a way that advances the widest possible public interest and benefit. In our opinion, nothing could be of wider public use and benefit than advancing the communications process between government and the people. Requiring assignment of one of the few remaining N11 service codes to state governments satisfies this test.

The principles expressed in this letter also reflect those embodied in a recently adopted NASTD resolution concerning N11 service code utilization. On behalf of the State of Montana and its people, widely scattered across vast rural areas where communications are essential to existence, I respectfully request that the Commission give these principles every favorable consideration.

Thank you.

Sincerely,



MARC RACICOT  
Governor